



WT Docket No. 01-309
RM-8658

May 3, 2005

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

Dear Ms. Dortch:

Blackfoot Communications, Inc. ("BCI") hereby submits its third report on its hearing aid compatibility compliance efforts, pursuant to the Commission's *Report and Order* in WT Docket No. 01-309, released August 14, 2003.

Respectfully submitted,

A handwritten signature in blue ink that reads "Michelle Wheeler". The signature is fluid and cursive.

Michelle Wheeler
Carrier and Regulatory Specialist
Blackfoot Communications, Inc.

Blackfoot Communications, Inc.
HAC Report as of May 3, 2006

Compliance Activities

1. **Beta Testing and Lab Testing** – BCI is a small rural carrier; and is relying on its equipment manufacturers to conduct full beta and lab testing of handset equipment. However, BCI will test the equipment it procures to make sure it meets the manufacturer's specifications.
2. **ANSI C63.19 Compliant Phone Models and Ratings** – BCI is unable to confirm with certainty that phones currently offered for sale comply with the ANSI C63.19 standards. BCI reviewed owner's manuals and manufacturers' websites in an attempt verify compliance; and, was unable to find reference to ANSI C63.19. However, it is important to note that today BCI does provide wireless services to many consumers with hearing aids.
3. **Product Labeling** – As manufacturers update their literature, BCI will make sure that the U-rating is available through display of either the manufacturer's box or separate literature generally available through its retail stores and corporate website.
4. **Outreach Efforts** – BCI anticipates using its corporate website, retail stores and mailers to assist in its outreach efforts.
5. **Retail Availability** – BCI currently offers handsets from several different vendors. As new handsets become available, they will replace equipment that may not be HAC compliant.
6. **Incorporation of HAC Features** – As a small rural carrier BCI is relying on its equipment manufacturers to incorporate HAC features into newer models of their handset equipment. BCI will ensure that it offers for sale handsets meeting this critical public need as compliant handsets become available.
7. **ANSI C63.19 Standards Activities Promoting Compliance** – As a small rural carrier, BCI is too small to actively participate in standards forums and so is relying on its equipment manufacturers to actively promote compliance of the ANSI C63.19 Standards. However, BCI anticipates that its activities will include offering compliant equipment and actively promoting availability of these products.
8. **Count of Compliant and Non-Compliant Phone Models** – BCI currently offers 0 compliant and 9 presumed non-compliant handset models.

9. **Interoperability Testing with Hearing Aid Devices** – BCI is a small rural carrier; and is relying on its equipment manufacturers to conduct full beta and lab testing of handset equipment. However, BCI will test the equipment it procures as soon as it is available to make sure it meets the manufacturer's specifications. BCI currently has a 72-hour return policy, which it will reevaluate, if needed, to accommodate consumers with hearing aid devices. In addition, BCI provides demo phones to customers with hearing aids and special accessibility needs. This gives them the opportunity to try various phones prior to purchasing services.